

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NIKYAMICHA HAMPTON and	)	
MARQUINE S. WILLIAMS, individually	)	
and on behalf of all others similarly situated,	)	
	)	
Plaintiff,	)	No. 16 CV 4693
	)	
v.	)	
	)	Hon. John Robert Blakey
CENTENE MANAGEMENT	)	
COMPANY, LLC,	)	Magistrate Judge Shelia Finnegan
	)	
Defendant.	)	

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL  
OF THE PARTIES' CLASS ACTION SETTLEMENT**

Plaintiffs, Nikyamicha Hampton and Marquine S. Williams, individually and on behalf of all others similarly situated, by their attorneys, respectfully move for the entry of an Order granting final approval of the Parties' Class Action Settlement Agreement. In support of their motion, Plaintiffs submit a supporting Memorandum of Law, the Declaration of Class Counsel, and the Declaration of the Claims Administrator, and state as follows:

1. On February 26, 2018, this Court granted preliminary approval of the Parties' Class Action Settlement Agreement (the "Settlement"). (ECF No. 58).
2. Final approval is appropriate where the court determines that a settlement is fair, adequate, and reasonable. *Synfuel Techs., Inc. v. DHL Express (USA), Inc.*, 463 F.3d 646, 652 (7<sup>th</sup> Cir. 2005).
3. The Settlement in this case was achieved in good faith and through arms-length negotiations, and is not the product of fraud or collusion.
4. The Settlement offers significant monetary relief to the Class Members.

5. The Settlement is supported by the Class Members. Only one Class Member submitted a request for exclusion, and none objected to the Settlement. These facts show strong support for the Settlement.

6. The Parties have provided the Class Members with adequate notice of the terms and conditions of the Settlement in a manner intended to maximize their due process rights.

7. Additionally, experienced Class Counsel have extensively analyzed the claims and issues herein, and certify that the Settlement is fair, reasonable, and adequate, and in the best interest of the Class Members. Thus, the Court should grant final approval of the Settlement, find the Settlement fair, reasonable, adequate, and in the best interests of the Class Members, approve Class Counsel's request for an award of attorneys' fees and costs, approve the Incentive Awards to the Named Plaintiffs, and enter the proposed final approval order dismissing this action.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter the proposed Final Approval and Dismissal Order attached as Exhibit 1 to Plaintiffs' Memorandum of Law.

Respectfully submitted,

NIKYAMICHA HAMPTON and  
MARQUINE S. WILLIAMS, individually and on  
behalf of all others similarly situated,

/s/ James X. Bormes  
One of Plaintiffs' Attorneys

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